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June 24, 2024

VIA ECF:

Hon. Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 18B
New York, NY 1007

*The conference is adjourned
to July 17 at 11:00 am.
6/25/24*

Re: Oval Capital Limited Liability Company (D/B/A Oval Capital Management) Et Al
V. Certain Underwriters At Lloyds, London Subscribing To Certificate/Policy No. 798200,
Authority Ref No B174010045ss22
Index No. 1:24-cv-02661

Dear Judge Cote:

We are counsel for Plaintiffs Oval Capital Limited Liability Company (D/B/A Oval Capital Management) and Tiferet Ventures, LLC. This letter is written in connection with the June 20, 2024 Order of This Honorable Court (the "Order"). To that end, for the reasons set forth below, Plaintiff respectfully requests an extension of time to file an Order to Show Cause for Default for a period of one week and adjournment of the return date of same.

Since the Order was issued, Plaintiff complied with the Order by way of transmittal of the Order, Summons, and Complaint as proscribed therein. This morning, this office was contacted by email by Barbara Demosthene, Litigation Counsel, Lloyd's America, Inc., whose email was barbara.demosthene@lloyds.com. In response to Ms. Demosthene's request for a copy of the Policy and additional information to identify the matter in their system, Plaintiff provided a copy of the Policy and certain information within an hour of the request. At this time, we are optimistic that Lloyds will respond today but have not received confirmation.

Given the time constraints, firm Court appearances today, the undersigned's engagement in private mediation tomorrow morning, personal obligations in the afternoon (including the undersigned's milestone birthday and family engagement), and the undersigned's paralegal and associate both being out today unexpectedly, it is respectfully requested that the time within to file the Order to Show Cause be enlarged by one week, and the return date similarly adjourned to a date thereafter convenient to This Honorable Court. Furthermore, we suspect Ms. Demosthene would realistically require some additional time to secure local counsel's appearance.